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UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

J.R.G., et al.,)	CASE NO. 4:22-cv-05183-KAW
)	
Plaintiffs,)	JOINT NOTICE OF CONDITIONAL
)	SETTLEMENT AND STIPULATION TO STAY
v.)	LITIGATION DEADLINES; [PROPOSED]
)	ORDER
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

The parties, by and through undersigned counsel, hereby notify the Court that the parties have reached a conditional settlement in this action under the Federal Tort Claims Act, 28 U.S.C. § 2671, et seq. and stipulate and request that all deadlines in the Court's Orders dated May 17, 2023 (Dkt. 50) and February 21, 2024 (Dkt. 61) be vacated and the action be stayed, based on the following:

1. The parties have reached a conditional settlement of all claims in this litigation, subject to the approval of the settlement of the minor's claims by a court of competent jurisdiction, which may take some time, to be followed by the approval of the Attorney General of the United States or his designee.
2. Absent a stay pending finalization of the settlement, litigation burden and expense will be incurred that are to be made unnecessary by the pending settlements.
3. The parties stipulate to file a joint status report every 60 days during the stay to keep the Court

1 apprised of the progress of the pending settlement. It is anticipated that, once the settlement is
2 completed, the parties will file a stipulation for dismissal of all claims.

3 Therefore, in the interest of judicial economy and efficiency, and to preserve the benefit of the
4 pending settlement, the parties request that the Court enter the attached order vacating all deadlines in
5 the Court's Orders dated May 17, 2023 (Dkt. 50) and February 21, 2024 (Dkt. 61) and stay this action
6 pending further stipulation or motion of the parties or Order of the Court.

7
8 DATED: April 5, 2024

Respectfully submitted,

9
10 LAW OFFICE OF JULIANNA RIVERA

11 By: /s/ Julianna Rivera Maul
12 Julianna Rivera Maul

13 NORTHWEST IMMIGRANT RIGHTS PROJECT

14 By: /s/ Matt Adams
15 Matt Adams
16 Aaron Korthuis

Counsel for Plaintiffs

17
18 DATED: April 5, 2024

Respectfully submitted,

19 ISMAIL RAMSEY
20 United States Attorney

21 /s/ Kenneth Brakebill¹
22 Kenneth Brakebill
23 Kelsey J. Helland
24 Assistant United States Attorneys

Counsel for the United States of
25 America

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27
28 ¹ In compliance with Civil Local Rule 5-1(h)(3), the filer of this document attests under penalty of
perjury that all signatories have concurred in the filing of this document.

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED that because the parties have reached a conditional settlement of all claims in this litigation, subject to the Court's approval of the settlement of the minor's claims,

1. All deadlines in the Court's Orders dated May 17, 2023 (Dkt. 50) and February 21, 2024 (Dkt. 61) are hereby vacated.
2. This action is stayed pending further stipulation or motion of the parties or Order of the Court.
3. The parties shall file a joint status report within sixty (60) days of the entry of this Order, and every sixty (60) days thereafter, in which they shall keep the Court apprised of the progress of the pending settlement.

DATED: _____

HON. KANDIS A. WESTMORE
United States Magistrate Judge